

1 A. I mean, other than, you know, determining,
2 you know, where he's coming from, where he was going.

3 Q. Okay. Let me ask you about that. Did you
4 ask him where he was coming from?

5 A. I did.

6 Q. Did he tell you?

7 A. Yes. South Carolina.

8 Q. He told you South Carolina?

9 A. I said, You do not have a license. Why are
10 you driving?

11 And that's when it was told to me that the
12 driver quit, in essence, and left him stranded, and
13 which then he was told to get the bus up to Kuzzens
14 because it was needed in the morning.

15 Q. Okay. Let me -- did you record that
16 statement?

17 A. As far as how?

18 Q. As far as what you just told me as to what
19 Mr. Tovar-Guzman said.

20 A. As in written?

21 Q. Yes.

22 A. I don't know if it was written or not.

23 I've got it right here. Original driver
24 left while in South Carolina. He had to get to
25 destination, so he drove.

1 Q. That's what you recorded as to what he said
2 about where he was coming from?

3 A. I think you have the same paperwork.

4 Q. Right. But is there anything else other
5 than that that you recorded as to what he said about
6 that, about where he was coming from and where he was
7 going?

8 A. He was coming from South Carolina. He was
9 going to Kuzzens. I know the farm he was going to
10 because it's right there in Painter.

11 Q. Okay. But it doesn't say anything about
12 Kuzzens here, so did he --

13 A. No, but I have it -- I have it written right
14 here. Kuzzens Circle, 1-6. Then I -- when the owner
15 showed up, I asked for his address so if I had to call
16 him or talk to him, I knew where to go and --

17 Q. Okay.

18 A. It's a labor camp.

19 Q. All right. I just want to make sure I'm
20 clear as to everything that Mr. Tovar-Guzman told you
21 about where he was coming from and where he was going.
22 It's my understanding that he told you -- and you
23 correct me if I'm wrong -- that the original driver of
24 the bus left while the bus was in South Carolina and
25 that Tovar-Guzman said that he had to get to the

1 destination so he drove the bus. Is that correct?

2 A. Yes.

3 Q. And the destination he told you was Kuzzens?

4 A. That's correct.

5 Q. Is there anything else that he told you
6 about where he was coming from, where he was going, or
7 why he was driving as opposed to somebody else?

8 A. Just that he had to get there. He was told
9 to get the bus here. It was needed in the morning.

10 Q. Did he tell you who told him to get the bus
11 there?

12 A. He said he called the owner. So, I mean, as
13 far as name or -- I mean, it has nothing to do with the
14 crash itself, so, you know --

15 Q. Right.

16 A. -- me determining -- those were questions I
17 asked, but it really has nothing to do with the crash.
18 It has everything to do with why he was driving without
19 a valid license, so I was trying to determine why he
20 was driving if he did not have a valid license.

21 Q. Well, let me ask it specifically. Do you
22 specifically recall him telling you that the owner told
23 him to drive the bus to Kuzzens Farm? Did he tell you
24 that?

25 A. He -- he told me that he had called the

1 A. He said he was working for Kuzzens.

2 Q. He told you that?

3 A. Uh-huh.

4 Q. Did you write that down?

5 A. I don't know if I wrote -- I don't think I
6 wrote that down. I just remember him telling me he
7 works for Kuzzens.

8 Q. Okay.

9 A. And that he was going to Kuzzens.

10 Q. All right. Did he tell you who his
11 supervisor was?

12 A. I did not ask.

13 Q. But did he tell you?

14 A. I did not ask.

15 Q. Okay. I know that, but did he tell you?

16 A. They don't normally just talk freely as to
17 what --

18 Q. Then the answer is no?

19 A. No. I did not ask, so --

20 Q. You say no if the answer is no.

21 All right. Now, you mentioned that at some
22 point a person arrived at the scene who spoke good
23 English?

24 A. Uh-huh.

25 Q. And can you -- you believe that person to be